

No. 4:15-CV-00638-ALM-CAN

George Morris  
Plaintiff

Vs.

United Healthcare Insurance of Texas  
Defendant

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§

In the US District Court  
Eastern District of Texas  
Sherman Division

**FILED**  
**MAY 19 2016**  
Clerk, U.S. District Court  
Texas Eastern

**Plaintiff's Motion To Sanction Defendant**

WHEREAS Plaintiff served discovery on Defendant on 4/11/2016,

WHEREAS Defendant acknowledged receipt of the discovery requests,

WHEREAS Defendant did not provide the requested answers to Plaintiff's Discovery by the end of the day on 5/12/2016,

WHEREAS the Federal Rules of Civil Procedure require a written response and opportunity to inspect the documents within 31 days,

WHEREAS more than the permissible 31 days have passed,

THEREFORE, PREMISES CONSIDERED, Plaintiff begs the Court to Sanction the Defendant for failure to make a timely response either by:

1) Striking the Defendant's pleadings and moving for Summary Judgment,

OR – FAILING THAT -

2) Compelling the Defendant to fully answer all Interrogatories and fulfill all Requests for Production without allowing any Objections,

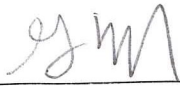
OR – FAILING THAT -

3) Prohibitting the Defendant from taking any depositions or calling any witnesses because none were timely designated.

OR – FAILING THAT -

4) To take such other action(s) as the court feels justified to Sanction the Defendant in respect to this violation of deadlines.

Respectfully Submitted,

By:  (5/13/2016)

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document has been served on the parties listed below via e-mail and fax.

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